

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
NORTHERN DIVISION

UNITED STATES OF AMERICA,

CR 21- *10016*

Plaintiff,

REDACTED INDICTMENT

vs.

SVEN SCHREIBER, and
ARNALDO PICCINELLI,

Bribery Concerning Programs Receiving
Federal Funds

18 U.S.C. § 666

Defendants.

The Grand Jury charges:

At all times material to this Indictment and to each count alleged herein:

- The Information Technology Department was a governmental department of the Standing Rock Sioux Tribe ("SRST" or "Tribe"), a tribal government that received federal assistance in excess of \$10,000 during each of the following one-year federal fiscal periods: October 1, 2015, and September 30, 2016; October 1, 2016, and September 30, 2017; October 1, 2017, and September 30, 2018; October 1, 2018, and September 30, 2019.
- SRST is located in the States and Districts of South Dakota and North Dakota.
- Beginning in or around December 2015, Defendant Sven Schreiber became the Director of the Information Technology Department of the SRST. Defendant Schreiber's duties included, among other things,

serving as the Tribe's primary contact with outside vendors and generating bids, contracts, and agreements relating to the work of the Tribe's Information Technology Department.

- Defendant Arnaldo Piccinelli provided information technology services on a sole-source, contract basis with the Tribe, by and through its Information Technology Department. Defendant Schreiber served as Defendant Piccinelli's point of contact regarding all of the contracts with the Tribe.
- Defendant Piccinelli accepted payments from the Tribe, at the direction of Defendant Schreiber, via checks made payable to Defendant Piccinelli individually or to Defendant Piccinelli's for-profit corporation, Hexagon Code, Incorporated.

COUNT 1

On or about the 16th day of February, 2017, in the District of South Dakota and elsewhere, the Defendant, Sven Schreiber, did corruptly solicit, demand, agree, and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Information Technology Department of the Standing Rock Sioux Tribe, involving \$5,000 or more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT 2

Between on or about the 1st and 14th days of September, 2017, in the District of South Dakota and elsewhere, the Defendant, Sven Schreiber, did corruptly solicit, demand, agree, and agree to accept a thing of value from a

person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Information Technology Department of the Standing Rock Sioux Tribe, involving \$5,000 or more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT 3

Between on or about the 19th and 25th days of July, 2019, in the District of South Dakota and elsewhere, the Defendant, Sven Schreiber, did corruptly solicit, demand, agree, and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Information Technology Department of the Standing Rock Sioux Tribe, involving \$5,000 or more, all in violation of 18 U.S.C. § 666(a)(1)(B).

COUNT 4

On or about the 16th day of February, 2017, in the District of South Dakota and elsewhere, the Defendant, Arnaldo Piccinelli, did corruptly give, offer, and agree to give a thing of value to any person intending to influence and reward Sven Schreiber, an agent of the Standing Rock Sioux Tribe, in connection with a transaction and series of transactions of the Information Technology Department of the Standing Rock Sioux Tribe, involving \$5,000 or more, all in violation of 18 U.S.C. § 666(a)(2).

COUNT 5

Between on or about the 1st and 14th days of September, 2017, in the District of South Dakota and elsewhere, the Defendant, Arnaldo Piccinelli, did

corruptly give, offer, and agree to give a thing of value to any person intending to influence and reward Sven Schreiber, an agent of the Standing Rock Sioux Tribe, in connection with a transaction and series of transactions of the Information Technology Department of the Standing Rock Sioux Tribe, involving \$5,000 or more, all in violation of 18 U.S.C. § 666(a)(2).

COUNT 6

Between on or about the 19th and 25th days of July, 2019, in the District of South Dakota and elsewhere, the Defendant, Arnaldo Piccinelli, did corruptly give, offer, and agree to give a thing of value to any person intending to influence and reward Sven Schreiber, an agent of the Standing Rock Sioux Tribe, in connection with a transaction and series of transactions of the Information Technology Department of the Standing Rock Sioux Tribe, involving \$5,000 or more, all in violation of 18 U.S.C. § 666(a)(2).

A TRUE BILL:

Name Redacted

Foreperson

DENNIS R. HOLMES
Acting United States Attorney

By 